

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

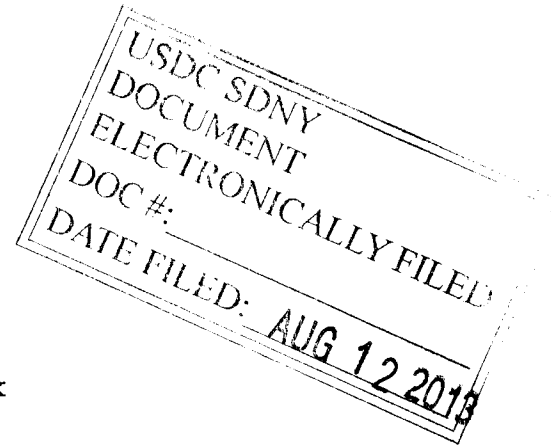
- v. -

RAYMOND CHRISTIAN,
a/k/a "Reckless,"
JAMES WILLIAMS,
a/k/a "L-1,"
TYRELL WHITAKER,
a/k/a "Bow Wow,"
RASHAWN VASSELL,
a/k/a "Bash,"
GLENN THOMAS,
a/k/a "Gucci," and
KEVIN BURDEN,
a/k/a "Kev Gotti,"

Defendants.

INDICTMENT

S1 12 Cr. 626 (ER)



COUNT ONE

The Grand Jury charges:

1. In or about December 2010, in the Southern District of New York and elsewhere, RAYMOND CHRISTIAN, a/k/a "Reckless," JAMES WILLIAMS, a/k/a "L-1," RASHAWN VASSELL, a/k/a "Bash," GLENN THOMAS, a/k/a "Gucci," and KEVIN BURDEN, a/k/a "Kev Gotti," the defendants, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that

term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, the defendants and others agreed to commit an armed robbery of individuals they believed to be in possession of narcotics and narcotics proceeds in Newburgh, New York.

Overt Acts

2. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about December 15, 2010, JAMES WILLIAMS, a/k/a "L-1," and KEVIN BURDEN, a/k/a "Kev Gotti," the defendants, arranged for firearms to be provided to RAYMOND CHRISTIAN, a/k/a "Reckless," RASHAWN VASSELL, a/k/a "Bash," GLENN THOMAS, a/k/a "Gucci," the defendants, and other co-conspirators not named as defendants herein.

b. On or about December 15, 2010, RAYMOND CHRISTIAN, a/k/a "Reckless," RASHAWN VASSELL, a/k/a "Bash," GLENN THOMAS, a/k/a "Gucci," the defendants, and other co-conspirators not named as defendants herein, robbed and attempted to rob individuals selling cocaine base and marijuana from an apartment located at 54 Chambers Street, Newburgh, New York.

(Title 18, United States Code, Section 1951.)

COUNT TWO

The Grand Jury further charges:

3. On or about December 15, 2010, in the Southern District of New York and elsewhere, RAYMOND CHRISTIAN, a/k/a "Reckless," JAMES WILLIAMS, a/k/a "L-1," TYRELL WHITAKER, a/k/a "Bow Wow," RASHAWN VASSELL, a/k/a "Bash," GLENN THOMAS, a/k/a "Gucci," and KEVIN BURDEN, a/k/a "Kev Gotti," the defendants, and others known and unknown, unlawfully and knowingly did commit and attempt to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, the defendants committed and attempted to commit an armed robbery of individuals they believed to be in possession of narcotics and narcotics proceeds, in the vicinity of 54 Chambers Street, Newburgh, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT THREE

The Grand Jury further charges:

4. In or about December 2010, in the Southern District of New York and elsewhere, RAYMOND CHRISTIAN, a/k/a "Reckless," JAMES WILLIAMS, a/k/a "L-1," RASHAWN VASSELL, a/k/a "Bash," GLENN THOMAS, a/k/a "Gucci," and KEVIN BURDEN, a/k/a "Kev

Gotti," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

5. It was a part and an object of the conspiracy that in or about December 2010, in the Southern District of New York and elsewhere, RAYMOND CHRISTIAN, a/k/a "Reckless," JAMES WILLIAMS, a/k/a "L-1," RASHAWN VASSELL, a/k/a "Bash," GLENN THOMAS, a/k/a "Gucci," and KEVIN BURDEN, a/k/a "Kev Gotti," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

6. The controlled substances involved in the offense were: (1) mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(C); and (2) a quantity of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

(Title 21, United States Code, Section 846.)

COUNT FOUR

The Grand Jury further charges:

7. On or about December 15, 2010, in the Southern District of New York, RAYMOND CHRISTIAN, a/k/a "Reckless," JAMES WILLIAMS, a/k/a "L-1," TYRELL WHITAKER, a/k/a "Bow Wow," RASHAWN

VASSELL, a/k/a "Bash," GLENN THOMAS, a/k/a "Gucci," and KEVIN BURDEN, a/k/a "Kev Gotti," the defendants, and others known and unknown, willfully and knowingly, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the robbery conspiracy, robbery, and attempted robbery charged in Counts One and Two above, did use and carry firearms, and, in furtherance of such crimes, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, and in the course thereof did cause the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, the defendants caused the death of Jeffrey Henry by discharging a firearm at Jeffrey Henry, in the vicinity of 54 Chambers Street, Newburgh, New York.

(Title 18, United States Code, Sections 924(j)(1) and 2.)

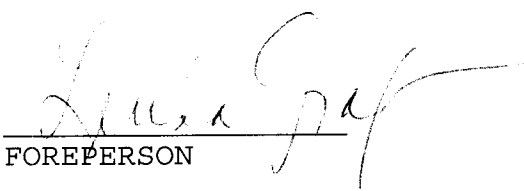
COUNT FIVE

The Grand Jury further charges:

8. On or about December 15, 2010, in the Southern District of New York, RAYMOND CHRISTIAN, a/k/a "Reckless," JAMES WILLIAMS, a/k/a "L-1," TYRELL WHITAKER, a/k/a "Bow Wow," RASHAWN VASSELL, a/k/a "Bash," GLENN THOMAS, a/k/a "Gucci," and KEVIN BURDEN, a/k/a "Kev Gotti," the defendants, and others known and unknown, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely,

the robbery conspiracy, robbery, and attempted robbery charged in Counts One and Two above, knowingly did use and carry firearms, and, in furtherance of such crimes, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, which firearms were brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii) & (iii) and 2.)


FOREPERSON


PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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Defendants.

INDICTMENT

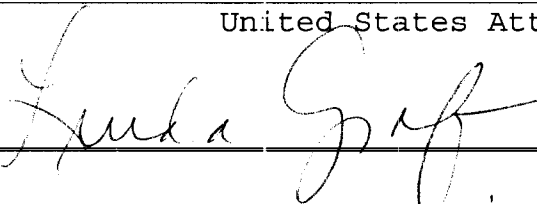
S1 12 Cr. 626 (ER)

(18 U.S.C. §§ 1951, 924(j), 924(c), and 2;
21 U.S.C. § 846.)

PREET BHARARA

United States Attorney.

Foreperson



8-12-13
MB

S1 Indictment filed... Ellis, VSMJ